

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 18-227-SLP
)	
JOSEPH MALDONADO-PASSAGE,)	
a/k/a Joseph Allen Maldonado)	
a/k/a Joseph Allen Schriebvogel)	
a/k/a “Joe Exotic”,)	
)	
Defendant.)	

DEFENDANT’S MOTION FOR LEAVE TO FILE A REPLY

Pursuant to Local Rule 12.1 Defendant, JOSEPH MALDONADO-PASSAGE, by and through the undersigned counsel respectfully seeks leave to file a reply brief of less than ten pages responding to certain arguments presented in the United States’ Response in Opposition to Defendant’s Motion for Disqualification filed on August 20, 2021 (DE #172).

The United States’ response in opposition raises several new arguments and legal authority raised for the first time. Mr. Maldonado-Passage believes that a short reply to the United States’ opposition to its motion for disqualification will aid the Court’s analysis of the legal issues presented by the motion for disqualification and the United States’ opposition.

WHEREFORE, Joseph Maldonado-Passage respectfully requests entry of an order to file a reply brief of less than ten pages to the United States' opposition. Should the court grant this request, Defendant proposes to file the proposed reply brief attached hereto as Exhibit "1."

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 27, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF and a copy hereof has been furnished to those registered participants of the ECF system.

/s/ John M. Phillips
John M. Phillips
Florida Bar No.:0477575
/s/ Amy M. Hanna
Amy M. Hanna
Florida Bar No.: 0120471
212 N. Laura Street
Jacksonville, FL 32202
(904) 444-4444
(904) 508-0683 (facsimile)
Attorneys for Defendant
amy@floridajustice.com
jphillips@floridajustice.com